

# **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both )  
individually and as Legal Guardian of )  
SHANE ALLEN LOVELAND, et al., )

Plaintiffs,

V.

THE GOODYEAR TIRE & RUBBER )  
COMPANY, )

Defendant.

Case No. 8:18-cv-00127

## **DEFENDANT’S PROPOSED JUDICIAL VOIR DIRE**

1. This case involves allegations that a tire manufactured by Goodyear was defectively designed and manufactured causing Shane Allen Loveland and Jacob Summers to sustain serious injuries. Have you heard of, or do you have any knowledge of, this case or its facts or circumstances?
2. Do you or anyone close to you work in the following professions:

<ul style="list-style-type: none"> <li>• Medicine</li> </ul>
<ul style="list-style-type: none"> <li>• Law enforcement or investigation</li> </ul>
<ul style="list-style-type: none"> <li>• Attorney, law office or the court system</li> </ul>
<ul style="list-style-type: none"> <li>• Accident investigation or reconstruction</li> </ul>
<ul style="list-style-type: none"> <li>• Fire Department or paramedics</li> </ul>
<ul style="list-style-type: none"> <li>• Engineering</li> </ul>
<ul style="list-style-type: none"> <li>• Writing, proof reading or analysis of product warranties</li> </ul>

<ul style="list-style-type: none"> <li>Care of the disabled</li> </ul>
<ul style="list-style-type: none"> <li>Education/Teaching</li> </ul>
<ul style="list-style-type: none"> <li>Counseling or mental health</li> </ul>
<ul style="list-style-type: none"> <li>Rehabilitation</li> </ul>

3. Have you, or any of your family members, or close friends ever owned a Goodyear tire?
4. Do you, for any reason, avoid using Goodyear brand tires?
5. Would any of your experiences with Goodyear products affect the way you viewed a case involving one of its tires?
6. Have you ever purchased used tires for a vehicle?
7. Have you ever used a tire that was more than 10 years old on your vehicle?
8. Have you ever had an issue with a tire that you thought was defective?
9. Have you or a member of your family ever been injured while using any kind of product, whether medical, mechanical, etc.?
10. Have you or anyone close to you ever sustained an injury you believed was due to someone else's negligence, whether it was a person, a company or anyone else, even if you did not sue?
11. Have you or any family members been involved in a serious automobile accident?
12. Have you or any family members experienced a tire that suddenly blew out or de-treaded but did not lose air? If so, did an accident ensue?
13. I will instruct you that in a court of law, everyone is treated equally no matter who you are—even if you are a company. Do you feel you could not give a company the same consideration in a lawsuit as you would an individual?
14. Do you have any negative feelings about corporations that may affect the way you perceive the evidence in this case?
15. Do any of you feel that because this case made it here to a jury trial, Goodyear must be responsible for the plaintiffs' injuries?

16. If the plaintiffs fail to prove that the Goodyear tire was defective, would you have difficulty rendering a verdict in which they receive no money in damages?
17. Would you have any hesitation about following my instruction that Goodyear is not liable for damages unless the plaintiffs prove that the tire at issue contained a defect?
18. In a civil lawsuit, the plaintiff who brings the lawsuit has the burden to prove his or her claims. As I will instruct you, the defense has no burden of proof. Do you have opinions about this law that you would still apply a burden of proof to Goodyear in this case?
19. Is there any reason at all (for example, religious, political or personal) that would make it difficult for you to be a fair and impartial juror in this case?
20. I will instruct you that you are not permitted to share anything on social media about the case or your experience as a juror during the trial. Do you believe you may have difficulty following this instruction?
21. I will instruct you that you are not permitted to do any outside research on the case, the attorneys, the parties, witnesses, the law, the judge, other jurors, or anything else. This includes online research of any type. Do you think you would have difficulty following that instruction?
22. Is there anything else the Court should know that might affect your ability to serve as a juror (e.g., emotional difficulties, concerns about the case subject, etc.)?
23. Is there something that you would rather discuss in private with the Court?